# IDAHO NATIONAL ENGINEERING AND ENVIRONMENTAL LABORATORY Department of Energy – Idaho Operations Office INTEGRATED SAFETY MANAGEMENT SYSTEM DESCRIPTION for the

Radiological and Environmental Sciences Laboratory

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# U.S. Department of Energy Radiological and Environmental Sciences Laboratory Central Facilities Area - INEEL

## Integrated Safety Management System Description

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#### I. Executive Summary

This document describes the integrated safety management system (ISMS) for the Radiological and Environmental Sciences Laboratory (RESL). The document also presents the DOE ISMS guiding principles and core functions, and summarizes selected elements of the DOE-ID ISMS as described in DOE-ID Guide 450.E-1, approved 08-04-99. The RESL ISMS program conforms to the safety management system described in DOE P 450.4, and DOE-ID Manager's Executive Policy statement ID EP 97-1, ES&H Management System Integration. This ISMS description document is consistent with but separate from the Idaho Operations Office ISMS description document.

RESL is a federally owned laboratory operated by federal employees of the Department of Energy's Idaho Operations Office. The laboratory is housed in three buildings at the Central Facilities Area of the Idaho National Engineering and Environmental Laboratory (INEEL) and all are non-nuclear facilities. RESL is a measurement quality assurance laboratory with key capabilities to perform chemical analyses of radioactive and hazardous materials, prepare standards for performance evaluation of analytical laboratories, perform radiation measurements and irradiate dosimeters and instruments in well defined radiation fields. RESL work activities are guided and directed by three management systems. The first is the set of applicable laws and regulations that govern federal activities in a laboratory environment. The second is the set of DOE and DOE-ID directives that are applied to all of the business and facility operations of the Department at the INEEL. The directives include policies, orders, notices, manuals and quidance documents. The third is a set of manuals and procedures developed by RESL management to address the specific programs and operations of the laboratory. In addition, since RESL and the laboratory buildings are located on the INEEL site which is operated and maintained through a Management and Operating Contractor for the DOE, interfaces with a set of INEEL contractor processes must be maintained in selected areas, e.g., maintenance, waste management, emergency response.

The RESL formalized administrative plans and work procedures incorporate the principles and functions of integrated safety management. DOE-ID and RESL management and staff are committed to these management systems. The result of this commitment is that RESL mission activities are performed only after identification and implementation of practices that achieve safe performance of work. Work is performed in a manner that provides protection for laboratory employees, contractors, visitors, the public and the environment. Work planning and analysis at the laboratory is a team effort where management and staff participate; laboratory personnel are both encouraged and expected to identify safety concerns and suggest actions to eliminate or mitigate hazards that may impede safe performance of work.

#### **II. Description of RESL Mission Programs**

RESL is located at the Idaho National Engineering and Environmental Laboratory (INEEL) in buildings CFA-690, CFA-676, and CFA-638 of the Central Facilities Area. It is a government owned and operated laboratory. The laboratory and its predecessors have been part of the DOE Idaho Operations Office (DOE-ID) since 1949. The main RESL facility (CFA-690) was built in 1963.

The major programmatic activities conducted at RESL are the

- a. DOE Laboratory Accreditation Program (DOELAP) conducted for DOE/EH to provide performance testing, onsite assessments, and accreditation of personnel dosimetry and direct and indirect radiobioassay programs as part of efforts to ensure the quality of radiation protection programs throughout the DOE complex (see DOELAP-AP-QA.13, DOELAP Administrative Activities, and DOELAP-AP-QA.17, Requirements for Performance Testing Laboratories).
- b. Mixed-Analyte Performance Evaluation Program (MAPEP) conducted for the DOE/EM National Analytical Management Program (NAMP) to provide performance testing to evaluate the quality of sample analysis results for laboratories supporting EM programs across the DOE complex. The performance testing includes radiologic, inorganic and organic target analytes. (See MOA between RESL, NAMP, EM-70 and DOE-ID, 1999; MAPEP-TP-1 & -2, Preparation of Performance Evaluation Water Samples and Preparation of Performance Evaluation Soil Samples).
- c. DOE National Analytical Management Program reference laboratory to NIST to provide input and coordination to develop an inter-comparison program with the National Institute of Standards and Technology (NIST) for maintaining RESL traceability for radiochemistry. (see the MOA between RESL, NAMP, EM-70 and DOE-ID, 1999)
- d. Nuclear Regulatory Commission (NRC) Radiological Measurement Assurance Program (see RMAP-1, Radiological Measurement Assurance Program Audits) that provides samples with NIST traceable radioactive standards to NRC regional laboratories, conducts laboratory audits, and designates RESL as a reference laboratory for the NRC. (see RESL Task Order Proposal for JCN J5142)

The facilities where RESL is housed are non-nuclear because of the limited quantities of radioactive material involved with laboratory programs conducted at CFA-690 and the type of sealed sources used at CFA-638. The laboratory has key capabilities in analytical chemistry separations and measurements, radiochemistry, inorganic chemistry, organic chemistry, the development and preparation of NIST traceable standard performance evaluation materials, and in radiation measurements, radiation field characterization, and calibrations. Limited quantities of radioactive and hazardous materials are used in preparation of performance evaluation samples and in the chemical analyses performed. Radioactive sealed sources are used to perform irradiations, calibrations, measurements, and beam characterizations.

Organizationally, RESL is a division of the Office of Assurance and Resource Management (OARM) at DOE-ID, see note 1 below. The relevant requirements and policies identified in document ID G 450.E-1 apply to the operation of RESL. Some requirements of ID G 450.E-1 are not directly the responsibility of the RESL Director, e.g., contractor oversight of construction management and environmental laws and regulations associated with land disturbances, because the ID sponsored work in these areas is performed by other ID and contractor organizations.

NOTE: DOE-ID announced a high level reorganization in late November 1999 with implementation expected early in January 2000. This reorganization would create a new

office to be named the Office of Energy Programs and Operations. RESL is proposed to be division of that office. Some of the responsibilities within the organizational units of DOE-ID may be shifted but the functions and their relationship to the RESL and DOE-ID ISMS should remain the same. Once the reorganization is complete and the FRAM and other documents are revised, this Description Document will be revised to reflect the new organization.

Federal employees manage and conduct the programs and activities of RESL but both federal and INEEL contractor employees work at the laboratory. The federal managers are responsible for the safety of the work place and for initiating programs and work activities that encourage and require safe work practices by all RESL employees. Employees of the INEEL management and operating (M&O) contractor support RESL in selected technical areas, e.g., waste management and industrial hygiene. Because RESL personnel perform "hands on" work, the laboratory has developed extensive operating and technical plans and procedures to ensure the environmental protection, safety, health and quality of operations at RESL.

CFA-690, 638 and 676 are all buildings on the INEEL site that are physically maintained by the INEEL M&O contractor. RESL is the primary tenant (tenant manager) in CFA-690 and CFA-676 and the only tenant in CFA-638. The INEEL contractor is the landlord for the three buildings RESL occupies and is responsible for facility maintenance and the safety of workers performing maintenance work. Site contractor personnel perform facility maintenance according to the requirements of the contractor maintenance program, Standard 101. The DOE-ID Office's primary function is to oversee the programs and operations managed by the INEEL contractor, including the safe operation of the maintenance program that serves all of the INEEL including RESL. RESL management requests work through the contractor for maintenance and improvements to RESL instrumentation or workspaces as necessary. RESL management, as the tenant manager and facility operations manager for the buildings, works cooperatively with the contractor to identify and mitigate hazards that could be encountered while working in and around the building.

Building CFA-690 also houses the M&O contractor dosimetry program for the INEEL and the USGS maintains space in three rooms. These groups operate under contractor or USGS requirements, respectively, and generally work through RESL management to address facility maintenance issues or other concerns. RESL management coordinates with the other tenants on any facility wide issues such as significant changes in the operations, facility hazards, safety inspections, or facility maintenance.

## III. Integrated Safety Management System Overview

RESL is a significant DOE program asset managed through the DOE-ID organization and management systems. The policies and guides cited in DOE-ID Integrated Safety Management System (ISMS) Guide, ID G 450.E-1, provide a top-level framework for the RESL ISMS program. Selected portions of the ISMS Overview in the ID Guide are summarized in paragraphs a. and b. below for the completeness of the RESL ISMS description. The Guide gives a more complete description of the ISMS approach for the ID programs. The RESL ISMS description identifies how the laboratory, as a unique facility, implements RESL-specific plans and programs in a manner that address the guiding principles and core functions of a DOE ISMS.

a. Introduction – The primary DOE-ID policy document on ISMS is DOE-ID Executive Policy 97-1, ES&H Management System Integration. This document sets out DOE-ID expectations for integration of ES&H into planning and performance of work. An important companion document is the DOE Idaho Operations Office Integrated Safety Management Functions, Responsibilities and Authorities Manual (FRAM), ID Notice 411.1. This manual contains the set of laws, orders, standards and guides applicable to DOE-ID operations and cross walks this information into the DOE-ID organization thereby establishing the requirements upon DOE-ID line managers and support organizations for ES&H. Appendix A provides flow-down of DOE and DOE-ID requirements for the operation of RESL.

DOE-ID provides top level management of all programs at INEEL. It controls and influences work planning, execution, and safety by establishing contracts; formulating budgets; issuing policy, directives and guidance; assigning clear roles and responsibilities to all staff; developing and administering programs and projects; maintaining communications; and conducting oversight.

- b. ISMS Infrastructure DOE-ID and RESL have developed their ISMS programs in a manner that readily demonstrate conformance with the guiding principles and core functions described in DOE P 450.4. The seven Guiding Principles from that Policy are listed below along with an eighth principle, Worker Involvement, added by DOE-ID and the INEEL contractor.
  - \* Line Management Responsibility for Safety
  - \* Clear Roles and Responsibilities
  - \* Competence Commensurate with Responsibility
  - \* Balanced Priorities
  - \* Identification of ES&H Standards and Requirements
  - \* Hazard Controls Tailored to Work Being Performed
  - \* Operations Authorization
  - \* Worker Involvement

#### The Core Functions of an ISMS are:

- \* Define the Scope of Work
- \* Analyze the Hazards
- \* Develop and Implement Hazard Controls
- \* Perform Work within Controls
- \* Provide Feedback and Continuous Improvement

The foundation of the DOE ISMS is line management responsibility and accountability for directing and conducting work in a safe manner. The management chain for RESL consists of (1) DOE Headquarters offices of the Secretary and the Office of Environmental Management with technical support provided by Office of Environment, Safety and Health, (2) the DOE-ID Manager, (3) the DOE-ID Assistant Manager (AM) for Assurance and Resource Management, (4) the RESL Director, and (5) the RESL Deputy Director.

Several DOE-ID Infrastructure programs establish the requirements and process for conduct of business for all work administered through DOE-ID.

- \* DOE-ID Directives System provides the formal process at DOE-ID to establish the DOE-ID authorities, responsibilities, requirements, local guidance, and local direction. This process provides for the establishment, application, and management of the Directives developed and used at the INEEL to supplement the DOE directives system established by DOE Order 251.1A, Directives System. The DOE-ID Directive System is found in ID Order 251.1, DOE-ID Directives System, and ID Manual 251.1-1, DOE-ID Directives System Manual. The RESL Manuals are referenced in the Assistant Manager (AM) Manual for OARM through the Quality Program Plans.
- \* DOE-ID has a Strategic Plan for the INEEL that reflects the overall DOE-HQ strategic plan for the complex. Achievement of the strategic goals in the DOE-ID Strategic Plan is defined and managed through the DOE-ID Planning Alignment Process, ID O 120.A, General Business Planning and Alignment. This process establishes the requirements and processes for the Headquarters/DOE-ID planning process, work and budget authorization, and results measurements and reward for work performed through DOE-ID.
- \* DOE-ID Quality Assurance Program, ID O 414.1, Quality Assurance, provides the quality assurance requirements applicable to the work managed by DOE-ID employees. These requirements are contained in the DOE-ID QA Program Description (QAPD). The QAPD is implemented in each of the DOE-ID management organizations through Quality Program Plans (QPP). The ARM organization has several QPPs including one for RESL (QPP-RESL-1, Quality Program Plan for RESL) and one for the DOE Laboratory Accreditation Program at RESL because of the variety of work performed across OARM and the desire of the Divisions to focus their quality programs. As appropriate, RESL supplements the QPPs with facility-specific and/or program specific quality management requirements and procedures in the RESL and DOELAP manuals.
- \* Emergency Management is managed as a site program to maintain an integrated/coordinated site response to and management of emergencies. All INEEL operations and facilities are supported by the INEEL site emergency management program. These programs are described in DOE-ID Order 151.1 Rev. 2, Comprehensive Emergency Management and in the INEEL M&O contractor procedures PRD-155, Emergency Management System, and Manual 16A, The INEEL Emergency Plan/RCRA Contingency Plan. RESL is covered in Manual 16A as Addendum 1 Central Facilities Area. The role of DOE-ID personnel in emergency management is described in the DOE-ID Operational Emergency Plan.

## IV. RESL Management Programs, Plans and Procedures for Integrated Safety Management

The RESL Integrated Safety Management System is described below; it is presented as a crosswalk to the DOE ISMS Guiding Principles and Core Functions. Appendix B provides a more complete listing of RESL programs and procedures for operating the laboratory linked to the ISMS core functions.

The RESL ISMS encompasses the federally managed operations of the laboratory . It does not encompass all of the M&O contractor safety systems that are necessary for the

operation and maintenance of the buildings, utilities, bus services, etc. that are necessary for the laboratory to function or the internal operations of the USGS and RDR tenants in CFA-690. The broader contractor and DOE-ID functions are addressed in the INEEL ISMS (PDD-1004) and the DOE-ID ISMS Guide (ID G 450.E-1). The RESL interfaces with those systems and groups are encompassed in this RESL ISMS.

## 1. Guiding Principle 1 – Line Management Responsibility

DOE and DOE-ID orders, policies and guidance establish line management responsibility for safety. The key DOE-ID ES&H policies are contained in 4 mandatory Executive Policies (ID EP 98-3, The INEEL Environmental Policy; ID EP 98-1, Quality; ID EP 97-1, ES&H Management System Integration; and ID EP 96-1, Environmental Compliance Policy) that describe the philosophies and fundamental values affecting DOE-ID employees. The DOE-ID FRAM, ID N 411.1, is a major DOE-ID Directive that identifies the ES&H responsibilities and requirements for the DOE-ID organization.

The requirements established in DOE and DOE-ID directives and described in the DOE-ID Guide 450.E-1 are applicable to RESL as a division of DOE-ID although all may not be relevant to the specific laboratory operations. The RESL Director is the line manager responsible for the safety of the worker and safe operation of the laboratory. As a complement to the DOE-ID directives RESL has three facility and program specific manuals that contain written plans and procedures that identify the requirements for performance of work and clear statements of line management responsibility. These sets of manuals are:

- (1) the RESL Manual, which contains administrative and technical procedures generally applicable to all RESL operations,
- (2) the Chemistry Manual, which contains technical procedures for analytical chemistry and preparing performance evaluation materials, and
- (3) the DOELAP Manual, which contains procedures for conduct of the DOELAP program and operation of the calibration laboratory in CFA-638.

The RESL Manual, for example, contains Plans and Administrative Procedures (AP) that establish the fundamental programs for operation of the laboratory, e.g., ALARA, chemical hygiene, waste management, laboratory/program safety analysis, personnel indoctrination and training, and detection and response to off-normal conditions. The RESL Manual also contains many Technical Procedures (TP) for performance of specific laboratory tasks. A Radiation Protection Program document also describes how the RESL procedures and plan comply with DOE radiation control directives. These procedures and plans describe specific responsibilities of line management for safety and management.

#### 2. Guiding Principle 2 – Clear Roles and Responsibilities

The DOE-ID Functions, Responsibilities and Authorities Manual, FRAM, contains the ES&H related functions, responsibilities and authorities for federal personnel at INEEL. RESL incorporates performance requirements contained in the FRAM into Position Descriptions and Performance Agreements for RESL federal employees (ID N 331.A1, Idaho Operations Office Performance Appraisal System). Employee specific responsibility and requirements statements are contained in position descriptions for each position and classification and finally performance agreements are developed and

signed each year by employees and supervisors that address the performance expectations for each year. The performance agreements incorporate the ES&H and other performance objectives and measures that have been agreed to in the DOE-ID Operating Plans. These objectives and measures flow down from the DOE-ID Manager's objectives through each Assistant Manager organization to the Division level objectives and measures as included in the AM Operating Plans. The performance agreements are the basis for the annual performance evaluations with each individual. Ongoing ES&H expectations for RESL employees are clearly described the RESL procedures.

RESL maintains a functional organizational chart that graphically identifies the laboratory working teams and reporting relationships for safe operations. The areas of responsibility for each staff member are further described in a functional assignment chart. As mentioned in section IV (1) above, the procedures in the 3 RESL manuals identify personnel responsibilities for specific laboratory job functions.

RESL management develops interface agreements with supervisors of contractor staff who support RESL directly on a long-term basis. These agreements direct contractor support personnel to operate under RESL procedures for their work on laboratory programs. Long-term RESL support positions include an electronics technician, machinist, computer system specialists, technicians and ES&H support.. Since these individuals are employees of the INEEL contractor they must follow all of the personnel policies and procedures of their employer including the training requirements. They follow RESL procedures for their laboratory support tasks. Contractor support personnel interface with federal personnel as coworkers and fellow team members, not in the contractor and federal oversight relationship that is typical for the other DOE-ID oversight functions across the INEEL. ES&H support personnel are expected to assist RESL management in ensuring the safe and compliance operation of the laboratory. They oversee the operation of the laboratory for compliance with requirements, resolve issues and create and participate in processes that will assure compliance, assist with resolution of issues and direct federal personnel relative to compliance requirements. If there are conflicts between a contractor procedure and a RESL procedure, or other conflicts, the individual is expected to raise the issue so it can be resolved with management.

Maintenance on CFA-690, 638 and 676, and on the associated utilities, is provided by the INEEL contractor organization, (e.g., facility maintenance) according to the INEEL M&O contract. An Interface Agreement or Memorandum of Agreement (MOA) is maintained between RESL, as the primary tenant, and the INEEL contractor Central Facilities Area organization to clearly define the responsibilities for facility maintenance activities, including ES&H. The contractor procedure titled INEEL Management Control Procedure for CFA Operations Information Roles and Responsibilities, MCP-3640, is the basis of the interface between tenants and the maintenance organization at CFA. This MOA describes the specific relationships for the RESL facilities including the responsibilities of each organization that allows maintenance workers to be aware of task and building hazards to safely perform maintenance tasks on the RESL buildings.

## 3. Guiding Principle 3 – Competence Commensurate with Responsibilities

RESL ensures that laboratory workers are selected and trained to perform their jobs in a manner that meets the job specific responsibilities (RESL-AP-QA-2.21, Indoctrination

and Training; DOELAP-AP-QA.11, Personnel Certification and Training, and CHEM-AP-15, Analyst Training and Certification Program). Position Descriptions define the general duties of a position and the knowledge required that may be evidenced through education or experience (DOE O 325.1, Position Classification, and ID G 450.E-1 §2.2.1). The RESL Training Coordinator maintains a record of the minimum educational and/or experience requirements as well as training required for each laboratory function. Each employee develops Individual Development Plans with their supervisor annually according to DOE-ID requirements for developmental and technical training.

In general, RESL staff members are required to read and sign that they understand RESL specific safety and technical procedures that are relevant to their work areas (RESL-AP-QA-2.21, DOELAP-AP-QA.05). The RESL procedures identify the major safety hazards and protective measures for the task. In addition, Job Safety Analyses (JSA) and Exposure Assessments (EA) have been developed for RESL processes and provided to the individuals that perform the work to ensure they are aware of the hazards and mitigation for the specific processes. RESL specific safety training is provided on a regular basis to address some of the principle hazards in the laboratory such as radiation control and safety, environmental protection, and chemical management as described in RESL procedures. Competent ESH&QA support personnel are available to assist the workers with any questions or concerns.

Specific on-the-job training is usually provided by senior staff members for individual work tasks. The laboratory worker is often required to demonstrate preparedness and capability to perform specific tasks before performing that work independently (DOELAP-AP-QA.11 and CHEM-AP-15) by getting the correct result when running an analysis or through evaluation by a qualified person. The qualification achieved is required by procedure to be documented. Technical training is provided by vendors for new or modified technical instrumentation and additional technical training is frequently provided to strengthen the qualification of the professional staff.

## 4. Core Function 1 – Define Scope of Work and Guiding Principle 4 – Balanced Priorities

The quality and timeliness of performance of laboratory activities is paramount for the success of its customers. Determining the priority and scope of authorized and performed work activities at RESL involves management and technical participation at three levels. The three levels of work prioritization and definition are discussed below and further described in the diagram at the end of this section.

a. Program Level – RESL scope of work is described in laboratory input to the DOE-ID strategic plan, the Office of Assurance and Resource Management Annual Operating Plan, DOE-ID staffing plans, agreements with program sponsors, and program definition procedures, (e.g., RESL Manual procedures for chemical hygiene and hazard communication).

Established Teams (DOELAP Team, MAPEP Team, and Analytical Measurements Team) perform the programmatic work of the laboratory. The RESL teams work with the program sponsors to develop detailed work plans that implement the established work scope and priorities through such mechanisms as Field Work Proposals. Additional direction from program sponsors may be in the form of schedules, contract scope of work descriptions and deliverables, and

budget authorizations. The specific mechanism varies for each program and is described below.

MAPEP: The scope of work for the MAPEP is described at the program level through the Memorandum of Agreement by and among Radiological and Environmental Sciences Laboratory, the National Analytical Management program, the EM Office of Site Operations, and the Idaho Operations Office, dated 3/25/99 and signed by Eugene C. Schmitt, Acting Deputy Assistant Secretary for EM Site Operations; and the MAPEP Handbook.

DOELAP: The programmatic scope of work for the DOELAP programs is described in two DOE Standards, The Department of Energy Laboratory Accreditation Program Administration, DOE-STD-1111-98, and The Department of Energy Laboratory Accreditation Program for Radiobioassay, DOE-STD-1112-98. It is further defined in the annual Field Work Proposal that is developed each year with DOE Office of Environment, Safety and Health (DOE-EH) that describes the key deliverables to DOE Headquarters for DOELAP.

NRC Radiological Measurements Assurance Program: The NRC program scope of work is defined in a task order proposal which is revised on a regular basis to accommodate changes in the work scope, generally annually. The task order proposal results with a Standard Order for DOE Work which authorizes funds from NRC to be available to DOE RESL for performance of the described work.

b. Facility Level – The work of the laboratory is performed to established technical protocols contained in the 3 RESL manuals. The work that is performed at RESL by the INEEL contractor in the areas of facility auxiliary services and maintenance is planned and managed consistent with the contractor's established programs. RESL management provides input to the contractor on the building needs through the designated contractor building engineer for the planning and scheduling process and gives the contractor approval to begin maintenance that effects laboratory operations. The work package sign off by RESL management or the administrative officer is done primarily to verify a safe interface with the operations in progress when the contractor employees do the maintenance work.

The RESL budget is based on meeting programmatic, safety, and environmental needs. The budget is approved through the DOE-ID internal budget process that considers safety and health priorities when allocating money (ID Order 120.A, General Business Planning and Alignment). RESL management is responsible for spending the budgeted funds to effectively cover program and safety work. If unbudgeted safety needs emerge during the year additional funds can be requested or existing budget reallocated.

The DOELAP Radiobioassay group develops a more detailed annual implementation plan to identify priorities and goals for the year. The External DOELAP group incorporated detailed goals in the OARM Operating Plan in FY1999. MAPEP prepares a schedule for the two performance evaluation material distributions each year and maintains procedures on preparation of the standards (MAPEP-TP-1 & MAPEP-TP -2). Technical requirements are

- contained in DOELAP Manuals addressing radiobioassay and dosimetry, and the MAPEP Handbook.
- c. Activity Level The RESL manuals contain procedures for preparation and approval of technical procedures (RESL-AP-QA-5.11, Preparation and Approval of Procedures, and DOELAP-AP-QA.01, Preparation and Review of DOELAP Procedures). The RESL, DOELAP and Chemistry Manuals each contain specific technical procedures for the numerous measurements and analyses performed in the laboratory programs. These manuals also contain procedures for authorizing new or modified work (RESL-AP-2), personnel indoctrination and training (RESL-AP-QA-2.21), waste certification, ALARA, Chemical Management and Storage (CHEM-AP-11), Quality Assurance (QPP-RESL-1), response to external assessments RESL-AP-QA-16.14), and numerous others. The technical procedures establish the requirements and provide the protocol for performing the work of the laboratory. The administrative and QA procedures establish how the laboratory will manage and respond to the range of operational situations.

### 5. Core Function 2 – Identify and Analyze Hazards

Safety analysis documents are maintained for the RESL facilities to address external and operational hazards as required by RESL-AP-2, and ID N 420.1, Safety Basis Review and Approval Process, and RESL-TP-HP.8, Radiological Work Control and Approval Process. Identification and analysis of ES&H hazards are conducted early in the work planning process. The DOE Radiation Control Manual requires an ALARA or radiation control policy which establishes that analysis of work shall consider methods to eliminate or mitigate radiological hazards present. The RESL ALARA Plan fulfills that requirement RESL. The RESL Radiation Protection Program describes how RESL processes comply with the requirements of 10 CFR 835, Occupational Radiation Protection. The RESL Manual also contains the Environmental Compliance Program Plan, Chemical Hygiene Plan and Hazard Communication Plan, which address identification and analysis of chemical, safety and environmental hazards.

New or modified work undergoes a preliminary review by the RESL Advisory Board for mission compatibility, safety and environmental issues, facility space and resources, and benefits (RESL-AP-2). As appropriate, further analysis will be performed for existing and new or modified work or processes through a Job Hazard Analysis/Exposure Assessment, and Environmental Checklist, as appropriate to the modification. The reviews also look at ways to reduce or prevent hazards by substituting or reducing quantities of hazardous chemicals, modifying a laboratory process to reduce or eliminate the generation of hazardous waste, and or modifying a laboratory process to avoid a hazard.

Existing work processes will be reviewed for safety and environmental hazards through preparation and updating of exposure assessments, the associated environmental checklists. Note: the procedure RESL-AP-2, Program Safety Analysis currently refers to the Job Hazard Analysis/Exposure Assessment and INEEL contractor procedure for conducting them as well as using the environmental checklist to identify environmental hazards. Although the strict definition of exposure assessments and job hazard analyses would not include radiation or industrial hazards, RESL intends to cover these additional hazards as part of this process. RESL-AP-2 will be revised to make this intent

clear. RESL has access to both DOE and contractor subject matter experts to assist in these analyses.

For maintenance work performed on CFA-690, 638 or 676, RESL management is required to sign the work packages, the maintenance workers are required to sign a log in the front office of CFA-690, and workers are informed of hazards specific to the work they intend to perform. Signs are posted above the maintenance log informing the workers of specific requirements for entry into the basement pipe runs and for accessing the roof of CFA-690. The INEEL contractor prepares and reviews the work packages and the work is performed according to INEEL contractor procedures, primarily Standard 101 for maintenance. The purpose of the interface with RESL is to ensure that current work conditions are assessed prior to authorizing workers to proceed when they arrive to do the work. The ongoing facility hazards are addressed, identified and mitigated, through the contractor processes for work package and job safety analysis development. RESL management coordinates with the other tenants on any facility wide issues such as significant changes in the operations, facility hazards, safety inspections, or facility maintenance.

## 6. Core Function 3 – Develop and Implement Controls, Guiding Principle 5 – Identification of Safety Standards, and Guiding Principle 6 – Tailor Hazard Controls to Work

Starting with the hazards identified, engineering and administrative controls are developed for planned work activities to prevent or mitigate these hazards. The RESL process for developing suitable, tailored controls is described in RESL-AP-2. The process depends upon laws and regulations, DOE and DOE-ID Orders, and common industrial safety practices. Additional guidance/requirements for operations involving radioactive materials is contained in RESL-TP-HP.8 and guidance for managing chemical hazards and waste is contained in RESL-AP-10, Waste Management, the Chemical Hygiene Plan and several IH procedures in the RESL Manual. General laboratory safety is addressed in RESL-TP-IH.2, General Chemical Laboratory Safety, and CHEM-AP-11, Chemical Management and Storage, and a significant number of chemical specific Industrial Hygiene procedures in the RESL Manual. Standard analytical practices and guidance appropriate for the specific work and hazard are used. Examples of these standards and guidance are OSHA standards, DOE and INEEL radiation control guidance and requirements, EPA and State of Idaho environmental requirements, National Fire Protection Association (NFPA) chemical management quidance, and equipment manufacturer recommendations. Specific laboratory operating controls are established in numerous areas, e.g., procurement (RESL-AP-4), receipt of hazardous materials (RESL-AP-11), preparation and approval of procedures (RESL-AP-QA-5.11), document control (RESL-AP-QA-6.11) and lock and tag (RESL-AP-8). Appendix B provides a more complete list of laboratory procedures related to work controls.

The subject matter experts working at RESL (e.g., Industrial Hygienist and Radiation Control Officer), the RESL scientists, and line management are responsible for identifying applicable requirements for the work processes (RESL-AP-2). When a hazard cannot be eliminated, engineering controls are established to manage the hazard (e.g., shielding, interlocked doors, spill prevention devices). When engineering controls are not possible or practical, administrative controls are used (e.g., work procedures, written warnings/cautions, and work control processes/documents, personnel

training/qualification and personal protective equipment). Work activities may then be authorized and performed within planned, analyzed and authorized conditions.

RESL also relies on many of the INEEL contractor systems for environmental and safety management since the laboratory is located on the INEEL site and because the INEEL contractor provides some of the services and performs some of the support functions of the laboratory. For example, although hazardous and radiological waste within RESL is managed by RESL staff, the INEEL contractor systems are used to determine and provide appropriate handling, treatment and disposal (RESL-AP-10, and a MOU between RESL and Waste Generator Services). RESL also relies upon the contractor emergency preparedness program to support RESL management for emergencies at RESL and also for RESL staff protection from emergencies at other INEEL facilities (PRD-155, Emergency Management System, PDD-6.8, Emergency Planning for the CFA, and ID O 151). RESL management and staff work cooperatively with the contractor in these areas; however, the systems and primary responsibility resides with the contractor. Accordingly, the contractor periodically conducts inspections of RESL waste management, facility safety, environmental systems, and safety practices. RESL staff participate in emergency preparedness drills and exercises.

RESL's primary environmental hazards are chemical, waste management, and air emissions. While RESL-AP-2 is the tool used to identify hazards for new or modified work processes, it is only the first step in environmental protection. If a potential for increased environmental insult would result from a change in RESL processes, Subject Matter Experts in DOE-ID would be consulted. Any resultant air permit applications, NEPA documentation beyond the categorical exclusion, or resolution of waste disposal issues would be worked through the DOE-ID SMEs with assistance and coordination with the INEEL contractor. RESL also participates in the contractor chemical tracking and inventory system for emergency preparedness and SARA reporting. The INEEL operates under one EPA hazardous waste generator number and is required to develop comprehensive air quality permit applications and emissions inventories. Therefore, it is necessary to coordinate and use the contractor services to ensure the site is represented appropriately to the regulatory bodies. Management of RESL environmental hazards is described in the Environmental Compliance Program Plan and RESL-AP-2.

## 7. Core Function 4 – Perform Work, Guiding Principle 7 – Operations Authorization

At the Program level, DOE-ID and program sponsors authorize work by approval of operating plans, Field Work Proposals, contracts, budgets and MOAs as described in §IV (4) of this document. At the facility level a specific RESL Team Leader or the RESL Director may then authorize work to begin through approval of procedures, SAR revisions, authorizing purchases, agreement with Advisory Board recommendations, and other mechanisms.

Hazard and work control documentation in the form of procedures is reviewed by appropriate RESL SMEs and is approved by a formal process (RESL-AP-QA-5.11, or DOELAP-AP-QA.01/DOELAP-AP-QA.02, Technical Review of DOELAP Procedures). The requirements and guidance from Radiological Work Permits, environmental permits, Exposure Assessments, new work reviews, etc. are incorporated in the technical work procedures where practical. The RESL Manual, the Chemistry Manual, and the

DOELAP Manual contain the Administrative and Technical Procedures used to perform the work activities of the laboratory (e.g., waste management, receipt of hazardous materials, indoctrination and training of personnel, sample receipt/logging/routing/disposal and reporting results, chemical management and storage, chemical analysis, radiation measurements and shipping radiobioassay DOELAP test samples).

Personnel preparedness to perform work is the responsibility of the RESL Director and Team Leaders who ensure that RESL staff members complete the appropriate training qualifications. Training to meet general site safety requirements, DOE-ID employee training requirements and developmental goals are listed in the Individual Development Plan (IDP) for each employee. At this time the IDP does not generally include RESL specific training requirements just due to developing requirements and changes to the IDP database and process in DOE-ID.

Appropriate training and qualifications includes demonstrating work proficiency in understanding and using work procedures prior to conducting independent work assignments (RESL-AP-QA-5.11; RESL-AP-QA-2.21; CHEM-AP-15; and DOELAP-AP-QA.11). When appropriate, RESL management directs that a formal readiness review be performed, using the guidance in DOE STD-3006-95, Planning and Conduct of Operational Readiness Reviews, as appropriate, prior to start of major work activities (RESL-AP-2). As laboratory work is conducted, Team Leaders, safety personnel and RESL management perform walkthroughs/surveillances of the workspace to observe work-in-progress (RESL-AP-5). In addition, surveillances and internal audits are performed to assess work performance for conformance with procedures (RESL-AP-QA-2.13). According to ID N 450.B, Imminent Danger Response Action, anytime an employee discovers a working condition or practice that could reasonably cause a situation of imminent danger to people or the environment, they are to contact the work supervisor to remedy the situation or, if time doesn't permit, order work to cease until the condition can be remedied.

For maintenance work performed on CFA-690, 638 or 676, the workers are required to have a work package approved through the contractor work control process and sign the log in the front office, RESL management signs the work package and authorizes them to begin after assessing the current work conditions. The INEEL contractor prepares and reviews the work packages and the work is performed according to INEEL contractor procedures, primarily Standard 101 for maintenance. The purpose of the interface with RESL is to ensure that current work conditions are assessed prior to authorizing workers to proceed when they arrive to do the work. The ongoing facility hazards are addressed, identified and mitigated, through the contractor processes for work package and job safety analysis development.

#### 8. Core Function 5 – Feedback and Improvement

The RESL manuals contain administrative and technical procedures that establish processes for performing evaluations of work performance under routine conditions and in response to upset conditions. Feedback on laboratory performance and identification of opportunities for improvement is provided by both worker and management participation in the established processes.

- a. The RESL safety committee conducts regular walk-downs of the workspaces and submits written observations and issues/concerns to the Safety Officer who reviews and compiles the information into reports for RESL management (RESL-AP-5).
- b. RESL management conducts and documents monthly walkthroughs, usually unannounced, of selected laboratory areas and activities and provides written observations, issues and concerns to the Safety Officer and to the responsible team leaders for resolution as needed (RESL-AP-5).
- c. Audits of radiological and radioactive material areas are conducted to evaluate conformance with requirements of 10 CFR 835 (RESL-TP-HP.10). Audits for conformance to RESL procedures are conducted regularly according to RESL-AP-QA-2.13 Quality Assurance Surveillance.
- d. External to RESL, ES&H oversight of the laboratory is provided by DOE-ID SMEs at the request of RESL management (see ID O 450.A, Line ESH&QA Oversight). SME surveillances are scheduled for specific hazards or processes such as environmental hazards and compliance, radiation control, and chemical safety. Resultant issues are tracked through the DOE-ID Issue Management order (ID O 410.A) which is reviewed by DOE-ID senior management and safety professionals. Independent oversight activities are provided through the Policy and Assurance Division of OARM (see ID O 220.B Independent Oversight) according to schedules that they develop each year. The DOE-ID and RESL Self-Assessment Program is discussed in detail in section 8.1 below. The program provides additional reviews of RESL ES&H and other activities by RESL and other ID employees.
- e. Additional external oversight is provided through occasional DOE-HQ reviews, and by the INEEL contractor through their ESH&QA facility surveillance processes. DOE-ID environmental and safety specialists may conduct reviews of RESL operations either scheduled or unscheduled at any time.

The RESL Safety Officer evaluates issues/concerns addressing laboratory operation and associated corrective actions (RESL-AP-5, RESL Safety Committee and Surveillance Program). The RESL Director reviews the issues and corrective actions, ensures an individual is assigned the responsibility for resolving the issue, and ensures the issues are provided to the laboratory Issues Coordinator for accountability (see RESL-AP-5). The RESL Director has overall responsibility for ensuring completion of these corrective actions.

A number of RESL procedures cover surveillance, (RESL-AP-5, RESL-AP-QA-2.13; Routine Audits and Surveillance, DOELAP-AP-QA.10, RESL-TP-HP.10); responding, reporting, critiquing and following-up on occurrences and assessments, (RESL-AP-3, RESL-AP-QA-16.14, DOELAP-AP-QA.08).

These procedures, when looked at as a system, ensure there is a regular review of processes for ESH&QA involving both individuals working within RESL programs and external to RESL staff, and that issues are identified and tracked until resolution.

## 8.1 Self-Assessment Program

RESL has implemented a self-assessment program for the laboratory in accordance with DOE Policy 450.5 Line ES&H Oversight, DOE-ID Order 450.A Line Environment, Safety, Health and Quality Assurance Oversight, DOE-ID Order 220.A DOE-ID Self Assessment. A solid self-assessment program ensures implementation and continual improvement to the Safety Management System. The components of the RESL Self-Assessment Program are outlined below.

Performance Measures: The RESL Director establishes annual Environment. Safety and Health performance objectives and measures, along with other programmatic objectives, consistent with guidance provided by the DOE-ID Manager and the line Assistant Manager. These objectives and measures are described in the DOE Operating Plans that are revised and approved annually. The objectives and measures in the Operating Plans flow down from the DOE-ID Manager's objectives through each Assistant Manager organization to the Division level objectives and measures which are documented in the AM Operating Plan. These Division level objectives and measures are then incorporated into the performance agreements for the management and staff members at RESL. The performance agreements are the basis for the annual performance evaluations with each individual. Ongoing ES&H performance objectives are incorporated into RESL procedures and are particularly clear in the Environmental Compliance Plan, the Chemical Hygiene Plan, various industrial hygiene procedures, and the Radiation Protection Plan. The RESL Director may define more specific performance measures for ES&H as well as programmatic activities as an addendum to the Operating Plan or in a Division level Operating Plan.

The RESL Director establishes annual ALARA goals and Radiological Performance indicators after consultation with the DOE-ID Radiation Control Officer. ALARA goals are required by DOE Standard 1098-99 Radiation Control (Chapter 1, Part 3 Section 132). Annual ALARA goals, performance indicators and their results are posted on the RESL RADCON bulletin board (RESL ALARA Plan) in the hallway in CFA-690.

- b Line & independent evaluations for compliance with requirements:
  - 1) Monthly accountability sessions are held with AM/OARM to review progress on Operating Plan goals and any ES&H or other issues of concern.
  - 2) The system of management and safety committee walkdowns, SME surveillances and independent audits of RESL processes are described in detail in Section 8.0 and elsewhere of this document.
  - 3) The DOE-ID Self-Assessment Order (DOE-ID O 220.A) requires each DOE-ID Assistant Manager to establish and implement a self-assessment process which includes at least 3 self-assessments each year with the results included in the mid- and end of year program reviews. The Order also requires an ID level self-assessment each year. RESL participates and provides RESL specific input to the AM directed and ID self-assessments, at a minimum.
  - 4) The Assurance Division of DOE-ID performs independent assessments according to DOE-ID Order 220.B Independent Assessment. Additional

independent assessments of RESL programs may be performed by HQ to review program accomplishments and methods or ES&H activities.

- c Data collection, analysis, and corrective actions: Issues arising from the various assessment mechanisms and the associated corrective actions are tracked to resolution according to RESL procedure (RESL-AP-QA-16.11) Conditions Adverse to Quality and DOE-ID Order 410.A & ID Manual 410.A-1 Issue Management.
- d Continuous feedback and performance improvement: Feedback, both positive and negative, is essential to improving performance. Several mechanisms have been identified to provide feedback to promote performance improvement for RESL processes. Feedback is provided to individuals and teams through surveillance reports, staff meetings, one on one discussions with staff members, team meetings, the safety committee, the Advisory Board, performance reviews, program reviews, the Lessons Learned Program, and accountability sessions. Performance improvement is achieved through evaluation of feedback, awareness of process steps, and implementation of relevant corrective actions.

## 8.2 Lessons Learned Program

The purpose of a lessons learned program according to "Development of DOE Lessons Learned Programs" DOE-STD-7501-95, is to:

"Share and use information to: 1) promote the recurrence of desirable activities, or 2) preclude recurrence of undesirable activities."

RESL participates in the DOE-ID Lessons Learned Program instituted through the DOE-ID Guide, Lessons Learned Program Management (ID G 230.A-1) according to DOE-STD-7501-95 and the DOE Handbook, Implementing U.S. Department of Energy Lessons Learned Programs (DOE-HNBK-7502-95). The program is partnered with the DOE Lessons Learned Program and that of the INEEL contractor.

The DOE-ID program serves to centralize the collection and dissemination of lessons learned for the ID Office, including RESL. DOE-ID identified a single point of contact for the program. Lessons learned are collected from various sources and disseminated to appropriate personnel for information and potentially for action. The program coordinator is also the point of contact for any lessons learned developed locally.

Lessons learned information is made available through the Internet and e-mail as it applies to different organizations. Lessons information applicable to RESL activities are often gained through technical publications, at specialty conferences and contacts with scientists and safety specialists at other DOE and contractor laboratories. Relevant lessons learned information within RESL may be shared and discussed at staff meetings and with individuals or smaller work groups.

RESL may also develop lessons learned for significant desirable or undesirable activities that could be of value to others. The information would be submitted through DOE-ID for dissemination through the ID and DOE-HQ Lessons Learned Programs. The process for submitting lessons learned information is described in ID G 450.E-1.

## 9. Guiding Principle 8 – Worker Involvement

DOE-ID policy and RESL manuals establish the requirement for worker involvement in the planning, control and performance of work (RESL-AP-2). RESL management provides overall leadership to ensure that workers are involved and informed on safety, programmatic and administrative activities and issues. The RESL Director uses twice monthly staff meetings for communication and awareness of laboratory activities, issues and concerns; one of these meetings includes a forum for safety and safety related training information (RESL-AP-5). The established teams identified on the functional organization chart also conduct training and awareness meetings on an as-needed basis to ensure that the mission of the team is being successfully and safely accomplished.

The laboratory has three additional formalized mechanisms that ensure that staff are involved and informed of ESH and QA as an integral part of laboratory programs and operational activities.

- a. The RESL Safety Committee is composed of representatives from each of the Teams. The role of the committee is described in the RESL Manual (RESL-AP-5). Committee members perform regular facility walk-downs, track resolution of issues and recommend safety initiatives. Membership on the Committee changes annually with the goal of all staff members having the opportunity to be involved over time.
- b. Each procedure in the RESL and Chemistry manuals has a designated owner who is responsible to ensure that procedures are maintained current and adequate by involving the primary users in preparation and updates (Table of Contents of the RESL Manual and the Chemistry Manual). The DOELAP team designates the preparer for each procedure as the individual responsible for updates as the process changes. The DOELAP document control coordinator is responsible for identifying when the regular review and update of each procedure should occur.
- c. The RESL Advisory Board meets on a nominal monthly schedule to discuss crosscutting RESL issues and make recommendations to management. The role of the Advisory Board is described in the RESL Manual (RESL-AP-2) and in the formal charter maintained for the Board. The Board participates in evaluations of new or modified work activities, safety concerns and initiatives, employee concerns or requests, facility needs and other RESL-wide issues. The Board membership consists of a representative of each of the laboratory teams, the safety officer, an ad hoc member and either the RESL Director or Deputy Director.

## Appendix A

## **Requirements Directives Flow-down Directory**

Number	Title	Implementing Directive
Public I	Laws	
PL-100-408	Price Anderson Act	N/A
	National Environmental Policy Act (NEPA)	RESL-AP-2, Note 1
PL-104-113	National Technology Transfer and Advancement Act	Note 1
Executiv	ve Orders	
11990	Protection of Wetlands	Note 1
11988	Floodplain Management	Note 1
12856	Emergency Planning and Community Right-to-Know Act (EPRCA) Chemical Inventory, Chemical Releases, Uses of Chemicals	DOE-ID O 151.A, Hazard Communication Plan, Environmental Compliance Program Plan, INEEL PRD-155 Emergency Management System, INEEL PLN-114 Emergency Plan/RCRA Contingency Plan - Manual 16A-1 CFA.
Code of	Federal Regulations	
FAR	Federal Acquisition Regulations	Note 1
DEAR	DOE Acquisition Regulations	Note 1
10 CFR 820	Procedural Rules for DOE Nuclear Activities	Note 1
10 CFR 830.120	Quality Assurance Requirements	QPP-DOELAP-1, RESL-QPP-1, DOE-ID-O 414.1, DOE-ID MP 98.1
10 CFR 835	Occupational Radiation Protection	Health Physics Procedures, RESL Radiological Protection Plan, ALARA Plan, RESL-TP.IH.1, Hazard Communication Plan

40 CFR 260, 261, 263, 264, 265, 266, 268, 270, 271, 272, 273, 279, 280	Resource Conservation and Recovery Act (RCRA)	(261and 265) RESL-AP-10,Hazard Communication Plan, (260-265) Technical Procedures
36 CFR Part 800	National Historic Preservation Act (NHPA) of 1966, as amended- Protection of Historical and Cultural Properties	Note 1
36 CFR Part 78	National Historic Preservation Act (NHPA) of 1966, as amended- Waiver of Federal Agency Responsibilities Under Section 110 of the NHPA	Note 1
36 CFR Part 60	National Historic Preservation Act (NHPA) of 1966, as amended- National Register of Historic Places	Note 1
36 CFR Part 63	National Historic Preservation Act (NHPA) of 1966, as amended- Determination of Eligibility for Inclusion in the National Register of Historic Places	Note 1
36 CFR Part 65	National Historic Preservation Act (NHPA) of 1966, as amended- National Historic Landmarks Program	Note 1
43 CFR Part 7	Archaeological Resources Protection Act (ARPA) of 1979- Protection of Archeological Resources	Note 1
36 CFR Part 79	Archaeological Resources Protection Act (ARPA) of 1979- Curation of Federally-Owned and Administered Archeological Collections	Note 1
43 CFR Part 10	Native American Graves Protection and Repatriation Act (NAGPRA) of 1990- Native American Graves Protection and Repatriation Regulations	Note 1
43 CFR Part 37	Federal Cave Resources Protection Act of 1988- Cave Management	Note 1
40 CFR Part 262.41	Biennial Report- RCRA	Note 1

40 CFR 355	Emergency Planning and Community Right-to-Know Act (EPCRA) Chemical Inventory, Chemical Releases, Uses of Chemicals- Emergency Planning and Notification	DOE-ID O 151.A, Safety Analysis Plan, Hazard Communication Plan, Environmental Compliance Program Plan, INEEL PRD-155 Emergency Management System, INEEL PLN- 114 Emergency Plan/RCRA Contingency Plan - Manual 16A-1 CFA
40 CFR 370	EPRCA- Chemical Inventory, EPRCA Chemical Releases, Uses of Chemicals- Hazardous Chemical Reporting: Community Right-to-Know	Hazard Communication Plan, Environmental Compliance Program Plan
40 CFR 372	EPRCA- Chemical Inventory, EPRCA Chemical Releases, Uses of Chemicals – Toxic Release Reporting	Hazard Communication Plan, Chemical Hygiene Plan, Environmental Compliance Program Plan
40 CFR 302	Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)- Spill Releases and Continuous Emissions- Designation, Reportable Quantities, and Notification	Safety Analysis Plan, Hazard Communication Plan, Chemical Hygiene Plan, Environmental Compliance Program Plan, RESL-AP-3
40 CFR 302.8	CERCLA- Spill Releases and Continuous Emissions- Continuous Emissions	Environmental Compliance Program Plan, Chemical Hygiene Plan
40 CFR 152-180	Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)- Pesticide Management- Environmental Protection Agency Pesticide Program	Note 1
40 CFR 261, Subpart C	FIFRA – Pesticide Management- Characteristics of Hazardous Waste (Disposal of Containers)	Note 1
40 CFR 372	FIFRA- Pesticide Management- Toxic Release Reporting	Note 1
40 CFR 761; PL 94-469; 15 USC 260	Toxic Substance Control Act	N/A
10 CFR 1021	National Environmental Policy Act (NEPA)	RESL-AP-2, Note 1
10 CFR 1021	NEPA- Protection of Wetlands	Note 1

10 CFR 1021	NEPA- Floodplain Management	Note 1
40 CFR 141-143	Safe Drinking Water Act- National Primary Drinking Water	Note 1
	Regulations; National Secondary Drinking Water Regulations	
40 CFR 144-148	Safe Drinking Water Act- Underground Injection Control (UIC)	Note 1
40 CFR 149	Safe Drinking Water Act- Sole Source Aquifer	Note 1
40 CFR 122-125, 136	Clean Water Act- National Pollution Discharge Elimination	N/A
	System (NPDES); Storm Water Discharge	
40 CFR 503	Clean Water Act- Sludge Management	N/A
40 CFR 257	RCRA- Land Disposal	Note 1
40 CFR 128, 403	Clean Water Act- National Pretreatment Program	N/A
40 CFR 117.3, 110.10, 112	Clean Water Act- Spill Prevention Program	N/A
40 CFR 280-281	RCRA- Underground Storage Tanks	N/A
40 CFR 61	National Emission Standards foe Hazardous Air Pollutants (NESHAP)	N/A
40 CFR 50	National Primary and Secondary Ambient Air Quality Standards	Note 1
40 CFR 58	Ambient Air Quality Surveillance	Note 1
40 CFR 60	Standards for Performance for New Stationary Sources	N/A
10 CFR 820-830	Price Anderson Act	N/A
49 CFR 107 Subpart B	Transportation Requirements Exemptions	N/A
State and L	ocal Regulations	
Idaho Code, Ch. 44,	Hazardous Waste Management- Idaho Annual Hazardous Waste	RESL Waste Certification Plan, AP-
Title 39	Generator Report- RCRA Reporting	10, INEEL Reusable Property,
		Recyclable Materials, and Waste
		Acceptance Criteria, INEEL PLN-114 Emergency Plan/RCRA Contingency Plan
IDAPA 16.01.06	Idaho Solid Waste Management Rules and Regulations	AP-10, (Contractor Procedures
12.11.10.01.00	Tame Solid Transcription Trains and Regulations	Referenced - MCP-154, MCP-155,
		MCP-156, MCP-157, MCP-442,
		MCP-443, MCP-453, MCP-457)

IDAPA 16.01.85I	Hazardous Material or Petroleum Product Spills	Note 1
Idaho Code Ch. 34, Title 22	Idaho Pesticide Law	Note 1
IDAPA 02.03.03	Idaho Department of Agriculture Rules Governing Pesticide Use and Application	Note 1
IDAPA 16.01.02	Water Quality Standards and Wastewater Treatment Requirements	Note 1
IDAPA 16.01.03	Individual and Subsurface Sewage Disposal Regulations	Note 1
IDAPA 16.01.05	Rules and Standards for Hazardous Waste	AP-10 (Contractor Procedures Referenced - MCP-154, MCP-155, MCP-156, MCP-157, MCP-442, MCP-443, MCP-453, MCP-457)
Idaho Dept. of Health and Welfare Rules and Regulations: Title 1, Ch. 17	Wastewater-Land Application Permit Regulations	Note 1
15 USC 2601 et. Seq.	Toxic Substances Control Act	N/A
DOE Polic	y Statements	
DOE P 251.1	Directives System	DOE-ID O 251.1, DOE-ID G 251.1-1
DOE P 410.1A	Developing Nuclear Safety Requirements	N/A
DOE P 411.1	Safety Management Functions, Responsibilities, and Authorities	RESL Manual, Chemistry Manual, DOE-ID N 411.1
DOE P 430.1	Land and Facility Planning	Note 1
DOE P 441.1	DOE Radiological Health and Safety Policy	ALARA Plan, Radiation Protection Program
DOE P 450.1	Environment, Safety and Health Policy for the Department of Energy Complex	RESL-AP-2, Environmental Compliance Program Plan
DOE P 450.2	Identification, Implementation, and Compliance with Environment, Safety and Health Requirements	RESL-AP-2 (Contractor Procedure Referenced - MCP 153)
DOE P 450.3	Authorizing Use of the necessary and Sufficient Process for Standards-Based ES&H Purposes	Note 1
DOE P 450.4	Safety Management System Policy	RESL ISMS Description

DOE P 450.5	Line Environment, Safety and Health Oversight	DOE-ID O 450.A, ID N 450.A3, AP-2
DOE P 1210.1	Guidance on Implementation of the Department's Public Participation Policy	Note 1
No Number	National Environmental Policy Act Policy Statement- Secretary O' Leary Memorandum dated 06/13/94	Note 1
New 1	OOE Orders	
DOE O 130.1	Budget Formulation Process	DOE-ID O 120.A, DOE-ID P 96.3
DOE O 135.1	Budget Execution- Funds Distribution and Control	DOE-ID O 120.A, DOE-ID P 96.3
DOE O 151.1	Comprehensive Emergency Management System	DOE-ID O 151.A
DOE O 210.1	Performance Indicators and Analysis of Operations Information	DOE-ID N 331.A1,DOE-ID M 210.A- 1, <i>Note 1</i>
DOE O 224.1	Contractor Performance-Based Management Process	N/A
DOE O 225.1A	Accident Investigations	RESL- AP-3
DOE O 231.1	Environment, Safety and Health Reporting	RESL-AP-3
DOE O 232.1A	Occurrence Reporting and Processing of Operations Information	RESL-AP-3, RESL-TP-IH.1
DOE O 251.1A	Directives System	DOE ID O 251.1, DOE-ID G 251.1-1
DOE O 360.1	Training	RESL-AP-QA-2.21, RESL-AP-15
DOE O 413.1	Management Control Program	Note 1
DOE O 414.1	Quality Assurance	RESL QPP, RESL -AP-QA Procedures, DOELAP-QA Procedures, DOE-ID O 414.1, DOE-ID MP 98.1
DOE O 425.1	Startup and Restart of Nuclear Facilities	RESL-AP-2, DOE-ID N 425.1
DOE O 430.1	Life-Cycle Asset Management	Note 1
DOE O 435.1	Radioactive Waste Management	Waste Certification for Radioactive Waste, AP-10, (Contractor Procedures Referenced - MCP-154, MCP-155, MCP-156, MCP-157, MCP-442, MCP-443, MCP-453, MCP-457)

DOE O 440.1A	Worker Protection Management for DOE Federal and Contractor	RESL-AP-2, DOE-ID N 440.A, MCP-
	Employees	153, <i>Note 1</i>
DOE O 440.2	Aviation	Note 1
DOE O 442.1	Department of Energy Employee Concerns Program	Note 1
DOE O 451.1A	National Environmental Policy Act Compliance Program	RESL-AP-2
DOE O 460.1A	Packaging and Transportation Safety	MAPEP-TP-1, RESL Waste Certification for Radioactive Waste, RESL-AP-10, RESL-AP-4
DOE O 460.2	Departmental Materials Transportation and Packaging	RESL-AP-4
DOE O 480.1	Work for Others ( Non-DOE Funded Work)	DOE-ID G 481.1-1, Nuclear Regulatory Commission Task Order Contract
Old D	OE Orders	
	e following lists may have been cancelled; however, DOE-ID continues to embrace	
DOE O 1230.2	American Indian Tribal Government Policy	Note 1
DOE O 1300.2A	Department of Energy Technical Standards Program	Note 1
DOE O 3790. 1B	Federal Employee Occupational Safety and Health Program	DOE-ID N 440.A, RESL-AP-2
DOE O 4330.4B	Maintenance Management Program	MOA w/INEEL Contractor
DOE O 5400.1	General Environmental Protection Program	Environmental Compliance Program Plan
DOE O 5400.5	Radiation Protection of the Public and the Environment	Health Physics Technical Procedures, Chemistry Technical Procedures, RESL-TP-IH.1
DOE O 5480.4	Environmental Protection, Safety, and Health Protection Standards	DOE-ID N 411.1, RESL-AP-2
DOE O 5480.19	Conduct of Operations Requirements for DOE Facilities	RESL-AP-3, Conduct of Operations Matrix, RESL-QAP-17.12, RESL- QAP-18.11, RESL-QAP-16.15, RESL-QA-16.11
DOE O 5480.20A	Personnel Selection, Qualification, and Training Requirements for DOE Nuclear Facilities	N/A

DOE O 5480.21	Unreviewed Safety Questions	N/A
DOE O 5480.22	Technical Safety Requirements	N/A
DOE O 5480.23	Nuclear Safety Analysis Reports	N/A
DOE O 5480.30	Nuclear Reactor Safety Design Criteria	N/A
DOE O 5482.1B	Environment, Safety, and Health Appraisal Program	RESL-AP-5
DOE O 5484.1	Environmental Protection, Safety, Health Protection Information Reporting Requirements	Environmental Compliance Program Plan, DOE-ID N 440.A
DOE O 5530.1A	Accident Response Group	Note 1
DOE O 5530.2	Nuclear Emergency Search Team	Note 1
DOE O 5530.3	Radiological Assistance Program	DOE-ID N 450.D
DOE O 5530.4	Aerial Measuring System	N/A
DOE O 6430.1A	General Design Criteria	Note 1
DOE N	<i>Aanuals</i>	
DOE M 135.1-1	Budget Execution Manual	Note 1
DOE M 140.1-1	Manual for Department of Energy Interface with the Defense Nuclear Facilities Safety Board	Note 1
DOE M 231.1-1	Environment, Safety, and Health Reporting Manual	RESL-AP-3, RESL-QA-16.11, RESL- QAP-16.14, RESL-QAP-16.15
DOE M 232.1-1A	Occurrence Reporting and Processing of Operations Information	Safety Analysis, RESL-AP-3
DOE M 251.1-1A	Directives System Manual (III)	DOE-ID O 251.1, DOE-ID G 251.1-1
DOE M 411.1-1	Manual of Safety Management Functions, Responsibilities, and Authorities	DOE-ID N 411.1
DOE M 440.1-1	DOE Explosive Safety Manual	Note 1
	The Department of Energy Closure Process for Necessary and	Note 1
DOE M 450.3-1	Sufficient Sets of Standards	

DOE Notices		
DOE N 440.1	Interim Chronic Beryllium Disease Prevention Program	Note 1
DOE N 441.1	Radiological Protection for DOE Activities	RESL-TP-HP.8
DOE N 441.3	Extension of DOE N 441.1 Radiological Protection for DOE Activities	RESL Radiation Protection Plan, RESL-TP-HP.8
DOE	Standards	
STD-1020-94	Natural Phenomena Hazards Design and Evaluation Criteria for Department of Energy Facilities	Note 1
STD-1021-93	Natural Phenomena Hazards Performance Categorization Guidelines for Structures, Systems, and Components	Note 1
STD-1022-94	Natural Phenomena Hazards Site Characterization Criteria	Note 1
STD- 1023-95	Natural Phenomena Hazards Assessment Criteria	Note 1
STD-1027-92	Hazards Characterization and Accident Analysis Techniques for Compliance with DOE Order 5480.23, Nuclear Safety Analysis Reports	Note 1
STD-1032-92	Guide to Good Practices for Operations Organization and Administration	Note 1
STD-1050-93	Guideline to Good Practices for Planning, Scheduling, and Coordination of Maintenance at DOE Nuclear Facilities	Note 1
STD-1051-93	Guideline to Good Practices for Maintenance Organization and Administration at DOE Nuclear Facilities	Note 1
STD-1052-93	Guideline to Good Practices for Types of Maintenance Activities at DOE Nuclear Facilities	Note 1
STD-1055-93	Guideline to Good Practices for Maintenance Management Involvement at DOE Nuclear Facilities	Note 1
STD-1063-93	Establishing and Maintaining a Facility Representative Program at DOE Nuclear Facilities	N/A
STD-1070-94	Guidelines for Evaluation of Nuclear Facility Training Programs	N/A
STD-1073-93	Guide for Operational Configuration Management Program	RESL-AP-17

STD-1082-94	Preparation, Review, and Approval of Implementation Plans for Nuclear Safety Requirements	Note 1
STD-1083-95	Requesting and Granting Exemptions to Nuclear Safety Rules	N/A
STD-1104-96	Review and Approval of Nonreactor Nuclear Facility Safety Analysis Reports	Note 1
STD 3006-95	Planning and Conducting of Operational Readiness Reviews	RESL-AP-2
STD-3009-94	Preparation Guide for U.S. DOE Nonreactor Nuclear Facility Safety Analysis Reports	Safety Analysis, RESL-AP-2
STD-3011-94	Guidance for Preparation of DOE 5480.22 (TSR) and DOE 5480.23 (SAR) Implementation Plans	RESL-AP-2
DOE-EM-STD-5502-94	Hazard Baseline Documentation	RESL-AP-2 (Contractor Procedures Referenced - MCP-153)
DOE Gu	ides	
DOE G 120.1-5	Guidelines for Performance Measurement	DOE-ID N 331.A1, DOE-ID G 210.A-1, <i>Note 1</i>
DOE G 151.1-1	Emergency Management Guide	DOE-ID O 151.A, (Implemented through INEEL PRD-155 Emergency Management System, INEEL PLN-114 Emergency Plan/RCRA Contingency Plan - Manual 16A-1 CFA)
DOE G 225.1A-1	Implementation Guide for use with DOE O 225.1A, Accident Investigations	Note 1
DOE G 440.1	Worker Protection Management for DOE Federal and Contractor Employees Guide for use with DOE O 440.1	DOE-ID N 440.A
DOE G 440.1-2	Construction Safety Management Guide to use with DOE O 440.1	Note 1
DOE G 440.1-3	Implementation Guide for use with DOE O 440.1, Occupational Exposure Assessment	RESL-AP-2, (Contractor Procedures Referenced - MCP-153)
DOE G 440.1-4	Contractor Occupational Medical Program Guide for use with DOE O 440.1	Note 1

DOE G 440.1-5	Implementation Guide for Fire Safety Program	DOE-ID O 420.A	
DOE G 440.1-7	Implementation Guide for use with DOE N 440.1, Interim Chronic Beryllium Disease Prevention Program	Note 1	
DOE G 450.4-1	Integrated Safety Management System Guide for use with DOE P 450.4, Safety Management System, and DEAR Safety Management System Contract Clauses (Volumes I and II)  RESL Integrated Safety Systems Description, R DOE-ID G 450.E-1		
DOE G 460.1-1	Implementation Guide for use with DOE O 460.1A, Packaging and Transportation Safety	RESL-AP-10, MAPEP-TP-1, Waste Certification Plan	
DOE G 481.1-1	Department of Energy Work for Others Guide	DOE-ID G 481.1-1, Task Order Contract	
DOE/EH-0173T	Environmental Regulatory Guide for Radiological Environmental Effluent Monitoring and Environmental Surveillance	Note 1	
DOE-ID- 10395 (96)	Idaho National Engineering and Environmental Laboratory Environmental Monitoring Plan	Note 1	
DOE-ID-10441	Idaho National Engineering and Environmental Laboratory Groundwater Monitoring Plan	Note 1	
ISO 14001	Environmental Management Systems	Note 1	
DOE Ha	andbooks		
HDBK-1085-95	DOE Enforcement Program Roles and Responsibilities	N/A	
HDBK-1089-95	Guidance for Identifying, Reporting, and Tracking Nuclear Safety Noncompliance's	N/A	
HDBK-1100-96	Chemical Process Hazards Analysis	RESL-AP-2 (Contractor Procedures Referenced - MCP-153)	
HDBK-1101-96	Process Safety Management for Highly Hazardous Chemicals	Note 1	
No Number	DOE-ID's Internal (NEPA) Scoping Procedures	Note 1	
No Number	NEPA Handbook- A Guide to the NEPA Process, by R.L.Twitchell	Note 1	
No Number	DOE-ID Award Fee Handbook (Draft)	Note 1	

Federal,	State, and Local Agreements	
DOE-ID-10520	Advanced Mixed Waste Treatment Project Tri-Party Memorandum of Agreement for BNFL Inc., DOE-ID and LMITCO	N/A
GM07-98ID-11017	Memorandum of Understanding between DOE-ID and DOE-CH regarding the interface between ANL-W and the INEEL	N/A
GM07-84ID-11017	Memorandum of Understanding between DOE-ID and Pittsburgh Naval Reactor Office (PNR) regarding the interface between NRF and the INEEL	N/A
EPA-IDR 00A194 and EPA-IDR	NPDES Storm Water Permits	Note 1
Various Permits	Waste Water Land Application Permits	Note 1
PTC No. 023-00001	State of Idaho Amended Permit to Construct for Nitrogen Dioxide Monitoring Requirements	Note 1
	State of Idaho Statewide Air Operating Permit	Note 1
	Federal Facility Agreement and Consent Order	Note 1
	Idaho Settlement Agreement	Note 1
	INEEL Site Treatment Plan	Note 1
	Tribal Working Agreement	Note 1
	Environmental Oversight and Monitoring Agreement	DOE-ID O 450.A, DOE-ID N 450.A3
Delegatio	on of Authority from DOE-HQ	
05-19-93	Paul D. Grimm memorandum to distribution; Subject: Delegation of Authority for Approval of Field Element Plans and Procedures	Note 1
10-29-93	Daniel A. Dreyfus (NE-2) memorandum to distribution; Subject: Delegation of Authority for Approval of Safety Documentation and Revisions Thereto.	N/A
05-08-94	Ray A. Hunter (NE-44) memorandum to J.M. Wylcynski; Subject: Delegation of Authority for Approval of Safety Documentation for NE-managed Hazard Category 2 Facilities	N/A

08-08-94	Thomas Grumbly (EM-1) memorandum to distribution; Subject: Delegation of Review and Approval authority for safety Document	DOE-ID N 425.1
	and for Startup/Restart fore Environmental Management Field Activities	
05-24-95	Victor H. Reis (DP-1) memorandum to J.M. Wilcynski; Subject: Delegation of Administration Functions to the Field for Special Manufacturing Capabilities Program	Note 1
04-10-98	James M. Owendorff (Acting EM-1) memorandum to distribution; Subject: Delegation of Authority for Approval for 10 CFR 830.120 Quality Assurance Programs/ Implementation Plans and 10 CFR 835 Radiation Protection Programs	
Internal De	legations of Authority from the Manager, DOE-ID	
OPE-SP-95-469	J.M. Wilcynski memorandum to M.R. Anderson; Subject: Delegation of Authority having jurisdiction responsibility for the National Electrical Code	Note 1
OPE-SP- 95-464	J.M. Wilcynski memorandum to P.N. Smith; Subject: Delegation of Authority having jurisdiction responsibility for Fire Protection, Life Safety, and General Property Protection	DOE-ID O 420.A
OPE-TRA-93-040	A.A. Pitrolo memorandum to T.F. Burns; Subject: Delegation of Authority for Approval of Safety Documentation and Facility Restarts for NE-Managed Facilities; Reference D.A. Dreyfus memorandum dated 10-29-93	DOE-ID N 425.1
OPE-CFA/WROC-95-025	T.F. Burns memorandum to R.M. Stallman; Subject: Delegation of Review and Approval Authority for Safety Documentation and for Startup/Restart Activities.	DOE-ID N 425.1

OPE-SP-95-006	J.M. Wilcynski letter to W.J. Denson; Subject: Approval of Facility-Specific Conduct of Operations Implementation Matrices (and delegates approval authority to the DOE-ID Facility Managers/Program Managers for all subsequent revisions)	Note 1
DOE-ID II	nternal Policies	
ID EP 96-1	Environmental Compliance Policy	Environmental Compliance Program Plan, DOE-ID MP 96.1, DOE-ID MP 98.3
ID EP 97-1	ES&H Management System Integration  Environmental Complian Plan, DOE-ID MP 96.1, 98.3	
ID EP 98-1	Quality	Environmental Compliance Program Plan, DOE-ID MP 96.1, RESL QPP, RESL/DOELAP QPP
ID EP 98-2	Equal Employment Opportunity Policy	Note 1
ID EP 98-3	INEEL Environmental Policy	Environmental Compliance Program Plan, DOE-ID MP 96.1, DOE-ID MP 98.3
DOE-ID II	nternal Directives and Notices	
	DOE-ID Notices	
ID N 130.A	Work Authorization and Control Policy	RESL- AP-2, RESL Technical Procedures, DOE-ID G 412.A-1
ID N 200.A	Appropriate Use of the Internet	Note 1
ID N 251.A	ID Directives System – Training Review	Note 1
ID N 311.A1	Sexual Harassment	Note 1
ID N 331.A1	Idaho Operations Office (ID) Performance Appraisal System	Note 1
ID N 411.1	DOE-ID Integrated Safety Management Functions, Responsibilities and Authorities	Note 1, Performance Agreements

ID N 420.A1	Safety Basis Review and Approval Process	RESL-AP-2, DOE-ID N 420.A1
ID N 425.1	Start-up and Restart of Nuclear Facilities	RESL-AP-2, DOE-ID N 425.1
ID N 430.D	Welding Practices and Activities at the INEEL	Note 1
ID N 430.1A	Life Cycle Assessment Management: ID Expectations	Note 1
ID N 440.A	DOE-ID Federal Employees Occupational Safety and Health Handbook	Note 1
ID N 440.B	Site Workplace Safety Policy	RESL-AP-5
ID N 450.B	Imminent Danger Response Action	Note 1
ID N 450.C	Authorization Agreements	N/A
ID N 450.D	Radiological Assistance Program for Personnel and/or Equipment from the INEEL Suspected of Being Radiologically Contaminated	Note 1
ID N 473.A	Physical Security Information	Note 1
ID N 473.B	Violence in the Workplace	Note 1
ID N 474.A	Control and Accountability of Nuclear Material	RESL-TP-HP.7, RESL-TP-HP.10
ID N 541.1	Selection, Appointment, and Termination of contracting Officers	Note 1
ID N 5660.1A	Management of Nuclear Material	RESL-TP-HP.7, RESL-TP-HP.10
	DOE-ID Orders	
ID O 120.A	General Business Planning Alignment	Note 1
ID O 151.A	Comprehensive Emergency Management	Note 1
ID O 210.A	DOE-ID Performance Measure, Trend Analysis and Communication	Note 1
ID O 220.A	DOE-ID Self Assessment	Note 1
ID O 220.B	Independent Assessment	Note 1
ID O 251.1	ID Directives System	Note 1
ID O 311.B	Harassment in the Workplace	Note 1
ID O 410.A	DOE-ID Issue Management	Note 1,
ID O 414.1	Quality Assurance	RESL QPP, DOELAP QPP
ID O 420.A	Fire Safety Program	Note 1

ID O 450.A	Line Environment, Safety, Health and Quality Assurance	RESL-AP-5, DOE-ID O 450.A, DOE-
	Oversight	ID MP 98.1
ID O 471.A	Protection Of Safeguards Information	Note 1
	ID Manuals	
ID M 210.A-1	Performance Measures, Trend Analysis and Communications Manual	Note 1
ID M 251.1-1	ID Directives System Manual	Note 1
ID M 360.A-1	DOE-ID Technical Qualification Program Manual	Note 1
ID M 410.A-1	DOE-ID Issue Management Manual	RESL AP-5
	ID Guides	
ID G 230.A-1	Lessons Learned Program	Note 1
ID G 310.A-1	Human Resources Emergency Notification Guide	Note 1
ID G 322.A-1	Guidelines for DOE-ID Telecommuting Program	Note 1
ID G 322.B-1	Guidelines for DOE-ID Alternate Work Schedule	Note 1
ID G 330.A-1	Differing Professional Opinion – Environment, Safety, Health and Quality Assurance Issues	Note 1
ID G 332.A-1	Recognition Program	Note 1
ID G 332.B-1	Facility Representative Incentive Program	Note 1
ID G 361.A-1	Guidelines for DOE-ID Tuition Assistance Program	Note 1
ID G 361.B-1	Guidelines for DOE-ID Annual Selection of Participants for Departmental and Interagency Management and Leadership Development Training Programs	Note 1
ID G 410.B-1	Conduct of Meetings	Note 1
ID G 412.A-1, Rev. 1	Work Authorization and Control System Guide	Note 1
ID G 430.A-1	DOE-ID Project Management Process Manual for Construction Projects	Note 1
ID G 450.E-1	DOE Idaho Operations Office (DOE-ID) Integrated Safety Management System Guide	Referenced in RESL ISMS

ID G 481.1-1	Work for Others Guidelines	Note 1	
	ID Manuals		
ID M 210.A-1	Performance Measures, Trend Analysis and Communications Manual	Note 1	
ID M 251.1-1	ID Directives System Manual	Note 1	
ID M 360.A-1	DOE-ID Technical Qualification Program Manual	Note 1	
ID M 410.A-1	DOE-ID Issue Management Manual	Note 1, RESL-AP-5	

Note 1: These requirements may apply to some phase of RESL Operations now or in the future, however, DOE/ID provides overall direction and management of the associated activities. RESL performs work under these requirements like the other ID organizations. In some cases, e.g., facility modification, RESL is not involved with the work activity; RESL will operate the facility when the modification is completed under the management of another element of ID.

Appendix B

## <u>Appendix B – ISMS Implementing Mechanisms</u>

Appendix B.1 - Idaho Operations Office Level Integrated Safety Management Mechanisms

Define Program/Work Scope	ID Strategic Plan
	ID O 120.A General Business Planning and
	Alignment
	AM Operating Plans
Identify/Analyze Hazards	ID N 420.A1 Safety Basis Review and Approval
	Process
	ID O 420.A Fire Safety Program
Develop/Implement Controls	ID N 420.A1 Safety Basis Review and Approval
	Process
Perform Work	DOE O 5480.19 Conduct of Operations
Feedback	ID O 220.A Self-Assessment
	ID O 410.A Issue Management

Appendix B.2 - RESL Specific Integrated Safety Management System Mechanisms

Define Program/Work Scope	ALARA Plan
	Bloodborne Pathogen Exposure Control Plan
	Chemical Hygiene Plan
	Environmental Compliance Plan
	Hazard Communication Plan
	MAPEP Handbook
	Safety Analysis for CF-690 and 676
	Safety Analysis for CF-638
	Waste Certification Program for Radioactive Waste
	QPP-RESL-1 Quality Program Plan for RESL

Identify/Analyze Hazards	QPP-DOELAP-1 Quality Program Plan for DOELAP QAM-DOELAP-RB QA Manual for DOELAP Radiobioassay DOELAP-AP-QA.13 DOELAP Administrative Activities DOELAP-AP-QA.17 Requirements for Performance Testing Laboratories Safety Analysis for CF-690 and 676
	Safety Analysis for CF-638 RESL-AP-2 Program Safety Analysis ALARA Plan Bloodborne Pathogen Exposure Control Plan Chemical Hygiene Plan Hazard Communication Plan
Develop/Implement Controls	ALARA Plan Bloodborne Path Exposure Control Plan Chemical Hygiene Plan Environmental Compliance Program Plan Hazard Communication Plan Safety Analysis for CF-690 and 676 Waste Certification Program Radiation Protection Program QPP-RESL-1 Quality Program Plan for RESL RESL-AP-2 Program Safety Analysis RESL-AP-4 Procurement RESL-AP-4.1 Procurement and Tracking of Chemicals and Hazardous Materials RESL-AP-8 Lock and Tag RESL-AP-10 Waste Management RESL-AP-11 Receipt of Hazardous Materials RESL-AP-QA-2.11 Preparation and Approval of

	Quality Program/Project Plans
	RESL-AP-QA-2.21 Indoctrination and Training
	RESL-AP-QA-3.12 Controlled Document Review
	RESL-AP-QA-5.11 Preparation and Approval of
	Procedures
	RESL-AP-QA-5.15 Preparation and Approval of Operator Aids
	RESL-AP-QA-6.11 Document Control
	RESL-AP-QA-6.12 Use of Controlled Documents
	RESL-AP-QA-12.11 Control of Measurement/
	Testing Equipment
	RESL-AP-QA-14.11 Inspection, Test and
	Operating Status
	RESL-AP-QA-15.11 Control of Nonconforming
	Items
	RESL-AP-QA-17.11 Records System
	CHEM-AP-15 Analyst Training/Certification
	, and the second
	Program  DOELAR AR OA 01 Proporetion and Approval of
	DOELAP-AP-QA.01 Preparation and Approval of DOELAP Procedures
	DOELAP-AP-QA.02 Technical Review of DOELAP Procedures
	DOELAP-AP-QA.03 DOELAP Approval
	/Cancellation of DOELAP Procedures
	DOELAP-AP-QA.04 DOELAP Procedure Interim
	Change Notice
	DOELAP-AP-QA.05 DOELAP Document Control
	and Distribution of Procedures
	DOELAP-AP-QA.06 Measuring and Test
	Equipment
	DOELAP-AP-QA.15 Procurement
	DO-AP.01 Access Control to CFA-638
	20 / 11 .01 / 100033 CONTROL OF / 1-000
Perform Work	Chemical Hygiene Plan
	1

Environmental Compliance Program Plan Waste Certification Plan for Radioactive Waste RESL-AP-2 Program Safety Plan **RESL-AP-10 Waste Management RESL-AP-11 Receipt of Hazardous Materials** RESL-AP-QA-2.21 Indoctrination and Training **RESL Manual Tech Procedures-Health Physics** RESL Manual Tech Procedures-Industrial Hygiene **RESL Manual Tech Procedures-Waste** Management CHEM-AP-1 Sample Receipt, Logging, Routing, Disposal and Reporting Results CHEM-AP-11 Chemical Management and Storage RMAP-AP-1 RMAP Audits Chem Manual Tech Procedures-Radioanalysis Chem Manual Tech Procedures-Chemistry **Analysis** Chem Manual Tech Procedures- Special Programs RB-AP.04 Shipping Radiobioassay DOELAP Test Samples

Farada and	Facility and a fall Orange library Burnary Bl
Feedback	Environmental Compliance Program Plan
	RESL-AP-3 Occurrence Response, Notification
	and Reporting
	RESL-AP-5 RESL Safety Committee and
	Surveillance Program
	RESL-AP-QA-2.13 Quality Assurance Surveillance
	RESL-AP-QA-15.11 Control of Nonconforming
	Items
	RESL-AP-QA-16.11 Conditions Adverse to Quality
	RESL-AP-QA-16.14 Response to External
	Assessments
	RESL-AP-QA-16.15 Quality Assurance Trend
	Analysis
	RESL-ÁP-QA-17.11 Records System
	RESL-AP-QA-18.11 Audits
	DOELAP-AP-QA.07 Corrective Action
	DOELAP-AP-QA.08 Resolving/Tracking Conditions
	Adverse to Quality
	DOELAP-AP-QA.09 Non-Conformance
	DOELAP-AP-QA.10 Routine Audit and
	Surveillance
	DOELAP-AP-QA.12 Complaint Resolution
	DOLLA TA WALIZ Complaint Recolution